

JOINT LETTER

July 27, 2020

Via ECF

Honorable Judith C. McCarthy
United States District Court
300 Quarropas Street
White Plains, NY 10601-4150

Re: *Holland v. Matos, et al.*, 18 Civ. 6697 (KMK) (JCM)

Your Honor:

The undersigned counsel for all parties write to request an extension of the deadline to complete fact discovery until August 28, 2020. Brenda Tokash, a non-party witness, was scheduled to be deposed on July 29, 2020. On July 25, 2020, Ms. Tokash advised Plaintiff's counsel that she was unable to attend her July 29 deposition due to a medical issue and asked to postpone the deposition until the week of August 24, 2020. Counsel for all parties have agreed to postpone Ms. Tokash's deposition and further agreed to request an extension of the discovery deadline so that Ms. Tokash's deposition can be taken in late August.

In light of the above, the parties request that the Court extend the deadline to complete fact discovery until August 28, 2020.

Respectfully submitted,

SCOTTHULSE, PC
Luis F. Calvo
One San Jacinto Plaza
201 E. Main Drive, Suite 1100
El Paso, Texas 79901
(915) 533-2493
Attorneys for Greg Holland

KRAMER LEVIN NAFTALIS & FRANKEL LLP
Michael Cohen
1177 Avenue of the Americas
New York, New York 10036
(212) 715-9230
*Attorneys for Thomas Matos, Nanci Matos
& BestLife Gifts, LLC.*